

# Fact Sheet



## For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 24, 2012.

Permit Number: **R30-09900010-2012**

Application Received: **June 15, 2012**

Plant Identification Number: **099-00010**

Permittee: **Braskem America, Inc.**

Facility Name: **Neal Plant**

Mailing Address: **200 Big Sandy Road, Kenova, WV 25530**

Permit Action Number: *MM01*      Revised: *Proposed*

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Physical Location:

Kenova, Wayne County, West Virginia

UTM Coordinates:

360.6 km Easting • 4,246.1 km Northing • Zone 17

Directions:

From I-64 take Exit 1. Go south on US 52, approximately 2 miles to the stop sign and turn right. Then take another right at "T" intersection and then go 1/4 mile then turn left just after going through railroad underpass. Make a left after underpass and go one mile to the plant entrance on the right.

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### Facility Description

Braskem America, Inc. (Braskem) operates a polypropylene production facility located in Kenova, WV; the facility is commonly referred to as the Neal Plant. The facility operates under SIC code 2821.

Braskem has submitted a Minor Modification application to revise the performance testing schedules for B603 and B604 to accommodate the most recent installation schedule for B604. The revised schedule has already been approved under R13-1830J.

## Emissions Summary

There are no emissions changes associated with this modification.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 130 TPY CO and 163 TPY VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Braskem America, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	NSR permits.
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1830J	July 10, 2012	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

The previous removal and testing deadlines in conditions 4.1.4.4 and 4.3.1 were based on an outdated construction schedule. Braskem submitted this modification to revise the test dates for the recently delayed construction of B604. Braskem requested delaying the deadline for removal of the B603 boiler from June 30, 2012 to December 31, 2012. If B603 is still in service after that date, a stack test will be required within 90 days; this stack testing was already required before this modification. The requested deadline changes were made.

As an alternative to the previous requirement in condition 4.3.2 to conduct testing for B604 within one year of the issuance date of R13-1830I, Braskem requested for testing within six (6) months after the startup of B604. The requested revision was made.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: N/A  
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Not applicable.